



October 28, 2020

Via Email

Mr. Gregory Ochs.
Director, Central Region
Office of Pipeline Safety
Pipeline Hazardous Material Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: Notice of Probable Violation - Viking Gas Transmission CPF 3-2020-1003

Dear Mr. Ochs:

Pursuant to the Notice of Probable Violation CPF 3-2020-1003 dated September 30, 2020, Viking Gas Transmission (Viking) respectfully submits the following response to the issues brought forth from the inspection of the Viking facilities which occurred from August 13 -17, 2018.

NOPV Item 1
PHMSA observation:

Viking failed to provide emergency shutdown (ESD) systems in at least two locations, each of which was outside the gas area of the compressor station and near the exit gates of the fenced station as required by §192.167(a)(4)(ii). Viking has a total of five compressor stations that did not have two separate locations for the ESD systems near exit gates in fenced areas. During the field inspection, MNOPS identified these five compressor stations without proper ESD locations. After notification and a chance to review, Viking noted that compressor stations in Minnesota named Milaca, Cushing, Frazee, Ada, and Angus, had turbines greater than 1000 horsepower added to these stations in 1997-1998. During discussions with Viking, Viking acknowledged that ESD pushbuttons near a second gate were needed at all five stations. Furthermore, in correspondence in January 2019, following the inspection, Viking stated that, *"A plan is being developed to install additional ESD buttons as needed at each Viking compressor station with installations to occur in 2019."* To date, Viking has not provided documentation to PHMSA showing that it has completed the ESD installations to bring them into compliance with §192.167(a)(4)(ii).

Viking's response:


Viking has completed the installation of the ESD systems at a second exit locations at each of the stations in question. Listed on the following page is the ESD in-service date at each location.

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| Compressor Station Name | Installation Date |
|-------------------------|--------------------|
| Milaca | September 26, 2019 |
| Cushing | October 4, 2019 |
| Frazee | October 17, 2019 |
| Ada | October 3, 2019 |
| Angus | October 22, 2019 |

Viking Gas Transmission hopes that you will find the information provided adequate to address the NOPV. If you require any additional information or clarification to this response, please contact Gary Numedahl, Director, DOT Compliance at 918-595-1546 or gary.numedahl@oneok.com.

Sincerely,

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Kevin Burdick
Executive Vice President and Chief Operating Officer